

THE STATE OF TEXAS §

COUNTY OF HARRIS §

AFFIDAVIT

BEFORE ME, the undersigned Notary Public, on this day personally appeared Dr. H. Edwin Young, who, being by me duly sworn, deposes and says as follows:

My name is Dr. H. Edwin Young. I am of legal age, and am competent to make this affidavit. The matters contained within this affidavit are within my knowledge and are true and correct.

I am the Pastor of Second Baptist Church of Houston, a not-for-profit religious corporation, 6400 Woodway, Houston, Texas 77057. I have been Pastor of Second Baptist Church since August, 1978.

On June 9, 1992, I was elected as President of the Southern Baptist Convention.

The Southern Baptist Convention is a convention comprised of associated autonomous local Baptist congregations whose purpose is to provide a general organization for Baptists for the promotion of Christian missions and other objects, such as Christian education, benevolent enterprises, and social services which is deemed proper and advisable for the furtherance of the Kingdom of God.

Article IV of the Constitution of the Southern Baptist Convention provides that the Convention "does not claim and will never attempt to exercise any authority over any other Baptist body, whether church, auxiliary organizations, associations, or convention."

The Convention does not have authority over the policies, activities, programs, or personnel of any local congregation member of the Southern Baptist Convention. The Convention does not distribute instruction to its member churches regarding any aspects of local congregation activities, including the "handling of complaints made by members" concerning sexual abuse allegations against its ministers or those affiliated with local congregation.

EXHIBIT 2

Any policies or procedures relating to claims of sexual abuse against members by church staff or ministers would be the product of the decision-making of such local Baptist congregation and is not the product of any instruction, guidance, or advice of the Southern Baptist Convention.

I hold the following degrees issued by the following institutions on the respective dates below:

Mississippi College, B.A., 1958  
Southeastern Seminary, B.D., 1962  
Furman University, D.D., 1973  
Criswell Center for Biblical Studies, D.D., 1984  
Southwest Baptist University, S.T.D., 1985  
Mississippi College, D.D., 1987  
Hannibal-LaGrange College, D.D., 1987

I have no educational training in the area of sexual abuse or the investigation of sexual abuse claims. I have had no personal experience relative to any claim of sexual abuse among church members of any church of which I have been Pastor since my ordination as a Baptist minister over thirty four years ago.

I have not served on any panels for discussion, attended any seminars, nor spoken on the subject of sexual abuse allegations by church members against ministers or those associated with the ministry. I have not studied any literature or material relative to sexual abuse by ministers against church members.

I have no knowledge of any policy or procedure of guidance issued by the Southern Baptist Convention regarding this topic.

I have no information regarding the incidents relative to the case of *Legal Guardian Jane Doe, Individually And As Next Friend of John Doe v. Riley "Rusty" Edward Cox, Jr., First Baptist Church of Conroe, Christian Counseling Center, and Wayne Norman*, Cause No. 91-10787, filed in the 61st Judicial District Court of Harris County, Texas.

I have not been retained as an expert witness in conjunction with that litigation nor have I been tendered any expert witness fee with regard to the Subpoena Duces Tecum and Notice of Deposition served upon me on Wednesday, September 2, 1992, a true and correct copy of which is attached hereto as Exhibit 1.

I do not hold an opinion as to the proper handling of any claims of sexual abuse by church members against their members or those affiliated with their local congregation.

As President of the Southern Baptist Convention, as a matter of religious polity, I am prevented from commenting on the internal religious, political, or legal aspects of any activity of any local Baptist congregation.

My testimony, in such regard, would adversely compromise my ability to serve as President of the Southern Baptist Convention, drastically discrediting my activities as President of the Convention in formulating and effectuating policies of cooperation and good will between local Southern Baptist congregations and the Convention in the most unfavorable and dramatic fashion.

Since 1979, as Pastor of Second Baptist Church of Houston, my sermons have been broadcast locally on a regular basis. I have appeared on local television and national television regarding religious issues since my arrival in Houston, Texas. My deposition testimony could unfavorably affect that television ministry, which now is seen on a daily basis in the greater Houston area.

As President of the Southern Baptist Convention, I do not have custody or control, nor any knowledge of any documents, tapes, brochures, manuals, policies, procedures, or church positions on handling sexual abuse complaints against members of the clergy or anyone associated with the Southern Baptist Convention.


As President of the Convention, I do not have custody or control of any claims, complaints, or allegations of sexual abuse by members of the clergy within the Southern Baptist Convention and during my tenure as President no such claims or allegations have been brought to my attention.

As President of the Convention, I do not have knowledge, custody or control of letters sent by the Convention to members or affiliates that detail suggestions, policies, procedures, rules, and guidelines established for the handling of sexual abuse complaints against members of the clergy or anyone associated with the Southern Baptist Convention.


As President of the Convention, I do not have custody, control, or knowledge of tapes or transcripts of any and all sermons or discussions with Southern Baptist Convention members wherein allegations of sexual abuse against clergy, or those associated with the Southern Baptist Convention, were discussed.

I declare under the penalty of perjury that the foregoing is true and correct, and if called as a witness, could competently testify thereto.

FURTHER, affiant sayeth not.

  
H. Edwin Young

SWORN TO AND SUBSCRIBED BEFORE ME this 4th day of September,  
1992, to which witness my hand and seal of office.

  
Notary Public in and for  
The State of TEXAS

